



# Public Service Company of Colorado

16805 ROAD 19 1/2  
PLATTEVILLE, COLORADO 80651

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April 30, 1980  
Fort St. Vrain  
Unit No. 1  
P-80093

Secretary of the Commission  
U. S. Nuclear Regulatory Commission  
Attn: Docketing and Service Branch  
Washington, D.C. 20555

Docket No. 50-267

SUBJECT: Proposed Rules, 10 CFR 19  
Federal Register Vol. 45,  
No. 60, Informal Confer-  
ence During Inspection

Gentlemen:

Under the proposed rule the Nuclear Regulatory Commission inspectors and the licensee have the option of inviting individuals with legitimate interests in matters pertaining to the inspection to an informal conference. We are not objecting to the basic intent of the rule which provides for the Nuclear Regulatory Commission to conduct its business in an open manner, but we do feel the rule as written is somewhat ambiguous, broad in nature, and subject to much interpretation.

The following comments are made in an attempt to clarify our concerns:

1. The term "legitimate interest" is ambiguous in itself and subject to considerable interpretation, which could include anything from someone who has some problem he/she would like to discuss to someone with specific technical expertise such as a consultant. Our concern is that we do not wish to see these informal conferences develop into an open forum. Perhaps the rule should be revised to limit the scope to individuals with legitimate and specific expertise which has a direct bearing on the inspection being conducted.
2. Along the same lines of our concern for the conferences developing into an open forum, we feel the extent of participation of individuals invited to such conferences should be defined. If the individual is a Nuclear Regulatory Commission

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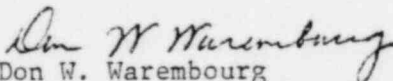
2. (continued)

invitee what access must be offered to this invitee in terms of access to various facilities, licensee records, personnel records, etc.?

3. The rule indicates that an informal conference may be held "at any time during an inspection". Without some knowledge of the intent of the conference, and the subjects to be discussed, arrangements to get necessary personnel at the conference at any time could be difficult if not impossible. Perhaps this statement should be revised to read "at any mutually agreed upon time".

We feel the above areas should be clarified to avoid possible interpretations on the part of both the Nuclear Regulatory Commission and Licensee.

Very truly yours,

  
Don W. Warembourg  
Manager, Nuclear Production  
Fort St. Vrain Nuclear  
Generating Station

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